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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EDYTA GRYGLAK, formerly known as
EDYTA A. FROMKIN,

Plaintiff,

vs.

HSBC BANK USA, N.A., as trustee for
WELLS FARGO HOME EQUITY ASSET-
BACKED CERTIFICATES, Series 2006-3,
by its Attorney-in-fact WELLS FARGO
BANK, N.A.; WELLS FARGO BANK,
N.A.; and WELLS FARGO ASSET
SECURITIES CORPORATION,

Defendants.

Case No.: 2:17-cv-01514-JCM-NJK

**STIPULATION AND ORDER
TO EXTEND PLAINTIFF'S TIME
TO RESPOND TO DEFENDANTS'
MOTION TO REOPEN DISPOSITIVE
MOTION DEADLINE**

(FOURTH REQUEST)

Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A., Wells Fargo Bank, N.A., and Wells Fargo Asset Securities Corporation (collectively, "Defendants" or "Wells Fargo") and Plaintiff Edyta Gryglak ("Plaintiff" and together with Defendants, the "Parties") hereby stipulate to extend by the current briefing schedule for Defendants' Motion to Reopen Dispositive Motion Deadline [ECF 136] (the "Motion to Reopen") to allow Plaintiff two additional weeks to prepare and file her response and to adjust the due date for Defendants' reply to avoid defense counsel's conflicts in other matters. If approved, this stipulation would extend the due date for Plaintiff's opposition from April 14, 2021 to April 28, 2021, and the due date for Defendants' reply from April 28, 2021 to May 12, 2021.

WHEREAS Defendants filed their Motion to Reopen on February 24, 2021;

1 WHEREAS the Court granted Plaintiff Edyta Gryglak's three prior requests, which
2 collectively extended the due date to file opposing papers from March 10, 2021 to April 14, 2021,
3 *see* Orders [ECF 138, 140, 142];

4 WHEREAS Ms. Gryglak's lead counsel, Edward Griffith, needs an additional two weeks
5 to prepare and file Plaintiff's opposition due to his litigation schedule on other matters and to
6 continue his analysis of certain potentially relevant information; and

7 WHEREAS Wells Fargo consents to this request;

8 **THE PARTIES HEREBY STIPULATE:**

9 1. Ms. Gryglak's due date to file papers in opposition to Wells Fargo's Motion to
10 Reopen is extended by two weeks, from April 14, 2021 to April 28, 2021 and the due date for Wells
11 Fargo's reply papers is extended from April 28, 2021 to May 12, 2021.

12 Dated: April 14, 2021

Dated: April 14, 2021

13 SNELL & WILMER L.L.P.

THE GRIFFITH FIRM

14 */s/ Blakeley E. Griffith*

/s/ Edward Griffith

15 By: _____
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19 *Attorneys for Defendants*

Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED that the due date for Plaintiff to file papers in opposition to Defendants' Motion to Reopen Dispositive Motion Deadline is extended by two weeks, from April 14, 2021 to April 28, 2021, and the due date for Defendants to file reply papers is extended from April 28, 2021 to May 12, 2021.

IT IS SO ORDERED.

DATED April 16, 2021.


U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2021, I electronically filed the foregoing **STIPULATION** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 14th day of April 2021.

/s/ Edward Griffith

EDWARD GRIFFITH, ESQ